

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

UNITED STATES OF AMERICA	)	CRIMINAL NO. 3:17-CR-640-MGL
	)	
	)	
v.	)	
	)	
CHRISTOPHER DAUGHERTY	)	

**GOVERNMENT’S MOTION TO SEAL**

COMES NOW the United States, by and through its undersigned counsel, and hereby moves this Court to seal a forthcoming document pursuant to *United States v. Doe*, 962 F.3d 139 (4th Cir. 2020). The purpose of the Government’s request is to protect the privacy and safety interests of the person involved. The United States respectfully submits that the privacy and safety interests of the individual involved outweighs the public’s limited interest in access to materials related to this matter. The United States notes that the Court has the inherent authority to seal these documents. *See, Baltimore Sun v. Goetz*, 886 F. 2d 60 (4th Cir. 1988); and *In re Application of the United States for an Order Pursuant to 18 U.S.C Section 2703(D)*, 707 F. 3d 283 (4th Cir. 2013). The United States further submits sealing the document is the narrowest means for serving the interests at stake and redactions would not protect the compelling interests of the individual. *See Doe*, 962 F.3d at 152. Prior to filing this motion, the undersigned contacted counsel for defendant, Joshua Kendrick, Esq., who indicated that he did not oppose this motion.

THEREFORE, the United States requests that the Court direct that the forthcoming document be sealed pursuant to *United States v. Doe*, 962 F.3d 139 (4th Cir. 2020) until further order of the Court.

Respectfully submitted,

ADAIR F. BOROUGHS  
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